



*Consulting Engineers  
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July 14, 2010  
(PBW Project No. 1584)

VIA FEDERAL EXPRESS

Mr. Gary Miller  
Superfund Division, Region 6 (6SF-RA)  
Arkansas/Texas Section  
U.S. Environmental Protection Agency  
1445 Ross Avenue, Suite 1200  
Dallas, Texas 75202-2733

Re: June 2010 Monthly Status Report, Gulfco Marine Maintenance Site, Freeport, Texas

Dear Mr. Miller:

Pursuant to Section XII, Paragraph 53 of the amended Unilateral Administrative Order (UAO) for the above-referenced Site, Pastor, Behling & Wheeler, LLC (PBW) has prepared this monthly status report on behalf of the Respondents LDL Coastal Limited LP (LDL), Chromalloy American Corporation (Chromalloy) and The Dow Chemical Company (Dow). As discussed in our telephone conversation on August 2, 2005, monthly status reports for a given month will be submitted by the 15<sup>th</sup> of the following month as required in Paragraph 53 of the UAO, rather than by the 10<sup>th</sup> of the following month as indicated in Appendix 1 of the Statement of Work (SOW) attached to the UAO. In accordance with the UAO requirements this report addresses the topics listed below:

1. Actions which have been taken toward achieving compliance with the UAO during the previous month – The following actions were taken during the previous month:
  - Risk Assessment activities (SOW Paragraph 37) detailed under Task 7 of the RI/FS Work Plan, including: (1) preparation of replacement table pages for the Final Screening-Level Ecological Risk Assessment (SLERA) Report (dated May 3, 2010) based on EPA comments as provided in an approval letter dated June 9, 2010; and (2) preparation of a Final Baseline Ecological Risk Assessment (BERA) Problem Formulation (PF) Report and Final BERA Work Plan and Sampling and Analysis Plan (WP/SAP)(both dated June 21, 2010), based on EPA comments on May 10, 2010 drafts of those documents as provided in your letter dated June 1, 2010.
2. Results of sampling, tests, modeling and all other data (including raw data) received or generated by or on behalf of Respondents during the previous month – The following data were received or generated during the previous month:
  - Field measurements of zinc concentrations in wetland sediment samples collected on June 24, 2010 using an X-ray Fluorescence (XRF) spectrometer are summarized on Table 1.

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3. Actions, data and plans which are scheduled for the next two months and other information relating to the progress of work – The following actions are planned for the next two months:
  - Respond to EPA comments, if any, on documents referenced in Item Number 1 above.
4. Information regarding percentage of completion, all delays encountered or anticipated that may affect the future schedule for completion of the work required, and efforts made to mitigate those delays or anticipated delays – RI/FS activities are approximately 80% complete.

Although not required by the UAO, the Respondents listed above have been working with EPA on developing: (1) an Administrative Settlement Agreement and Order on Consent (AOC) for a Time-Critical Removal Action for tank removal activities at the former tank farm area at the Site; and (2) a separate AOC for preparation of an Engineering Evaluation and Cost Analysis (EE/CA) for a Non-Time-Critical Removal Action to address wetland and pond sediment areas, and repair the former surface impoundments cap.

In regard to number 1 above, the Respondents are awaiting EPA to provide a revised draft AOC for the tank removal activities. The Respondents view the diligent initiation and completion of tank removal activities as extremely important in light of NOAA's predictions for an "active to extremely active" 2010 hurricane season. In regard to number 2 above, a draft AOC and Statement of Work (SOW) for the EE/CA was provided by EPA on July 12, 2010 and is currently under review. In support of the EE/CA-related activities, the Respondents performed a supplemental wetland sediment sampling program in June. Depending on the data obtained from the supplemental wetland sediment sampling program, and the progress toward development of the abovementioned removal action AOCs, other actions, in addition to those described above, may be performed during the next two months.

Thank you for the opportunity to submit this status report. Should you have any questions, please do not hesitate to contact me.

Sincerely,

PASTOR, BEHLING & WHEELER, LLC



Eric F. Pastor, P.E.  
Principal Engineer

cc: Mr. Doug McReynolds – EA Engineering, Science and Technology  
Ms. Luda Voskov – Texas Commission on Environmental Quality  
Mr. Ray Merrell – Sequa Corporation  
Mr. Brent Murray – Environmental Quality, Inc.  
Mr. Donnie Belote - The Dow Chemical Company  
Mr. Allen Daniels - LDL Coastal Limited, LP  
Mr. F. William Mahley - Strasburger & Price, LLP  
Mr. James C. Morriss III - Thompson & Knight, LLP  
Ms. Elizabeth Webb - Thompson & Knight, LLP

**TABLE 1**  
**X-RAY FLUORESCENCE FIELD MEASUREMENTS OF ZINC CONCENTRATIONS**

Sample ID or Location	Sample Date	XRF Result		
		Container Sample Measurement (ppm)	Surface Measurement (ppm)	Duplicate Surface Measurement (ppm)
5WSEDA-1	6/24/10	401	643	509
5WSEDA-2	6/24/10	262	839	797
5WSEDA-3	6/24/10	333	645	764
5WSEDA-4	6/24/10	NM	533	500
5WSEDA-5	6/24/10	666	2046	1091
5WSEDA-6	6/24/10	361	886	991
5WSEDA-7	6/24/10	437	446	423
5WSEDA-8	6/24/10	541	715	593
5WSEDA-9	6/24/10	383	1999	1874
5WSEDA-10	6/24/10	405	841	652
5WSEDA-11	6/24/10	72	633	543
5WSEDA-12	6/24/10	134	309	293
5WSEDB-2	6/24/10	195	250	361
5WSEDB-3	6/24/10	717	622	533
5WSEDB-4	6/24/10	393	625	867
5WSEDB-5	6/24/10	NM	649	830
5WSEDB-6	6/24/10	NM	369	395
5WSEDB-7	6/24/10	221	289	209
5WSEDB-8	6/24/10	872	436	649
5WSEDB-9	6/24/10	784	814	784
5WSEDC-1	6/24/10	113	118	113
5WSEDC-2	6/24/10	170	240	286
5WSEDC-3	6/24/10	131	256	263
5WSEDC-4	6/24/10	163	167	177
5WSEDC-5	6/24/10	78	207	193
5WSEDC-6	6/24/10	75	157	148
5WSEDF-1	6/24/10	NM	NM	NM
5WSEDF-2	6/24/10	86	96	84
5WSEDF-3	6/24/10	161	289	361

1. Measurements collected using Innov-X Alpha XRF analyzer.
2. NM = Not Measured.